

Federal Defenders OF NEW YORK, INC.

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By Hand Delivery

The Honorable Leonard B. Sand
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

USDS SDNY
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August 4, 2008

Re: United States v. Dignora Perez
07 Cr. 1175 (LBS)

Dear Judge Sand:

I represent Dignora Perez in the above-captioned case, and write to request that her bail conditions be modified. Specifically, I request that her passport be returned to allow Ms. Perez to secure alternative identification. I have spoken to Assistant United States Attorney Randall Jackson, who consents to this request.

Ms. Perez is charged in a one-count indictment with housing fraud, in violation of 18 U.S.C. § 641. On March 26, 2008, this Court imposed the following bail conditions: a \$10,000 personal recognizance bond, travel restricted to the Southern and Eastern Districts of New York, and the surrender of all travel documents.

Ms. Perez's United States passport is the only form of identification that she possesses. Upon the return of her passport, she intends to apply for a New York State identification card from the Department of Motor Vehicles. Once she has secured the new identification, she will return the passport to the court.

Ms. Perez does not pose a flight risk. She is a naturalized United States citizen, works as a matron at the City Center theater, and lives with her 19-year-old son, who will start college in the fall. She has no prior criminal history.

Thank you for your consideration of this request.

Respectfully submitted,

M. S. Cohen

Martin S. Cohen
Attorney for Dignora Perez
212-417-8737

cc: Randall W. Jackson, AUSA via facsimile 212-637-2937

MEMO ENDORSED

*Endorsement
granted on
comment*

*So ordered
B. Sand
8/5/08*

MEMO ENDORSED